

**NL**

177-410  
57

April 24, 1987

Certified Mail - RRR

Director, Waste Management Division  
USEPA, Region V  
Attn: Mr. Brad Bradley (SHE-12)  
230 S. Dearborn Street  
Chicago, IL 60604

Director, Illinois Environmental  
Protection Agency  
Attn: Mr. Ken M. Miller  
2200 Churchill Road  
Springfield, IL 62706

Re: NL/Taracorp Site  
Granite City, Illinois  
Bi-Monthly Progress Report

Gentlemen:

This correspondence shall serve as our second bi-monthly progress report pursuant to Section J, Paragraph 23 (a), of the Administrative Order by Consent, May 14, 1985.

During the week of April 6, the second quarter groundwater samples were procured. In addition, a field determination was made jointly by the project coordinators representing the U.S. Environmental Protection Agency (EPA), the Illinois Environmental Protection Agency (IEPA) and NL Industries regarding the deletion of selected parameters from the second quarter sampling, as "significant concentrations" were not identified in the analysis of the first quarter sampling. These parameters included: selenium, silver, chromium (hexavalent), mercury, and antimony. Copper and nickel similarly revealed less than "significant concentrations". However, due to Illinois Water Quality Criteria specifications and the existence of measurable concentrations, these parameters were not subject to deletion. NL was informed during a telephone conversation on April 21, 1987, that the above

**NL Industries, Inc.**  
Environmental Control Department  
P.O. Box 1090, Hightstown, N.J. 08520 Tel. (609) 443- 2405

field determination was rescinded by the IEPA, as they desired a verification of all analysis, including those which were determined to be non-detectable during the first quarter activities.

The RIFS Work Plan specifies the procurement of rainwater runoff and sediment deposition samples from the waste pile. A rainfall, capable of creating surface runoff from the waste pile, has not occurred as of the April sampling activities and NL notified the Agencies of this potential force majeure condition. This matter was discussed by all project coordinators during the week of April 6, and a determination was made that the Agencies would notify NL Industries of their chosen option to address the potential force majeure condition. The options presented to the Agencies by NL Industries included:

1. Delete the specified sample requirements from the RIFS Work Plan.
2. Accept a force majeure condition.

The deletion of the specified sampling would allow NL Industries to adhere to the present scheduled submittal of the draft RI report by June 25, 1987. Accepting a force majeure condition would permit the sampling, analysis, and incorporation of the sample results in the draft RI Work Plan. The duration of the force majeure condition is totally weather dependent. However, the project schedule would be adjusted to reflect the duration realized between April 15, 1987 and the sample procurement date. A final determination by the the Agencies has not been made.

A visual examination into the stratification of the existing waste pile was conducted, on April 9, in accordance with the NL proposal, submitted with the previous bi-monthly progress report. During the investigation, it was determined that several feet of dense clay materials underly the area of the waste pile. This determination was made by excavating in two quadrants of the waste pile to depths of approximately 21 to 26 feet.

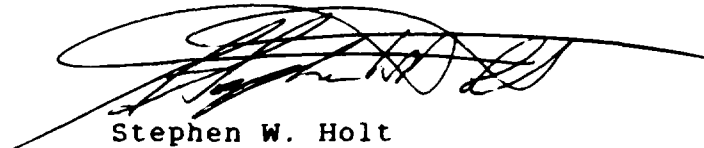
NL has determined that additional data should be procured to provide for a more comprehensive remedial investigation report. Specifically, additional soil samples were procured within the sampling grid, in order to clarify anomalies identified during the review of previous sampling data, and to fill-in previous void areas within the sampling grid. Seven additional soil samples were procured and one deposit sample was procured. These samples represent location numbers: 4, 6, 10, 11, 17, 18, 32, and 40.

NL/Taracorp Site  
Granite City, IL  
Bi-Monthly Progress Report  
April 24, 1987  
page -3-

Similarly, additional data is desired to better investigate groundwater contouring and quality. Therefore, NL Industries proposed, on April 21, to install an additional deep zone monitoring well, to aid in the determination of groundwater contours. In addition, such a well, if located toward the eastern portion of the site, may aid in clarifying the anomalies observed in wells 108S and 108D. NL believes that such data is pertinent to the RI report, as well as the Feasibility Study. Failing to address the need for additional data within the remedial investigation, in a timely fashion, may subject the Remedial Investigation Report and the subsequent Feasibility Study to excessive delays.

Please do not hesitate to contact me at 609-443-2405 if you have any comments or questions.

Very truly yours,



Stephen W. Holt  
Senior Environmental Engineer

SWH/tb

cc: Deputy Chief, Environmental Control Division  
Illinois Attorney General's Office  
500 South Second Street  
Springfield, Illinois 62706

cc: Frank D. Hale, OBG

**NL**

RECEIVED

March 13, 1987

Director,  
Waste Management Division  
U.S. EPA - Region V  
230 So. Dearborn Street  
Chicago, Illinois 60604

Attention: Mr. Brad Bradley

Director,  
Illinois Environmental Protection Agency  
2200 Churchill Road  
Springfield, Illinois 62706

Attention: Mr. Ken Miller

Re: NL/Taracorp. Site  
Granite City, Illinois  
Bi-Monthly Progress Report

Gentlemen:

This correspondence shall serve as our first bi-monthly progress report pursuant to Section J, Paragraph 23(A), of the Administrative Order by Consent, May 14, 1985.

During the preceeding months considerable attention was directed toward Task 2 and Task 3. Specifically, several site visitations were conducted for purposes of Investigation Support and procurement of samples pursuant to the required site investigations. Samples were procured from the waste piles on the Taracorp site and the adjoining St. Louis Lead Recycling site. Soil samples were procured from 32 locations in accordance with the revised sampling grid, developed during the week of January 5, 1987. A reduced copy of the Granite City site area map, delineating the locations sampled, is attached. The analytical results are anticipated prior to the end of the month.

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Mr. Brad Bradley, USEPA  
Mr. Ken Miller, IEPA

March 13, 1987  
Page 2

Additional soil samples were procured from the specified alley locations and the properties on Terry and Harrison Streets. Similarly, we anticipate these results prior to the end of the month.

The first quarter groundwater samples were procured during the week of January 5, 1987. The preliminary results are attached. I am pleased to note that the lead results for all wells are well below the drinking water quality level of 0.05 mg/l.

I look forward to discussing the results, following your review, relative to the selection of specific sampling parameters for the second quarterly sampling activity. Presently, the second quarterly sampling is scheduled for the week of April 6, 1987.

The surface water investigation and the sediment investigation sampling activities have not been completed at this time due to unfavorable weather conditions. The personnel at the St. Louis offices of O'Brien & Gere Engineers have standing orders to complete this sampling during the first rainfall sufficient to generate a representative sample of surface water runoff and sedimentation. It is anticipated this sampling will be completed prior to our April 6, sampling activity as referenced above.

NL Industries is presently investigating various remedial technologies with O'Brien & Gere Engineers and OH Materials, Inc. Further investigations are being directed toward fixation methodologies for lead-in-soil, as patented by Lopat Enterprises, Inc.

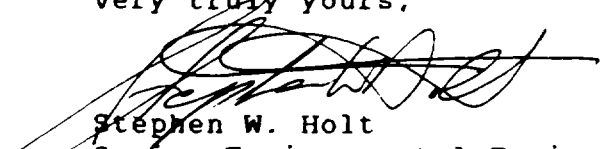
NL Industries, in order to assure that sufficient data base is available, regarding the selection of preliminary remedial technologies, is presently scheduling an investigation regarding the stratification of the Taracorp waste pile, utilizing a track mounted backhoe. This concept was discussed during our meetings of January 5, 1987. Various concerns were discussed at that time including: control of fugitive air emissions, operator and personnel safety due to power lines in proximity to the the pile, and equipment contamination. Accordingly, NL's proposal addressing these concerns is attached for your information.

Mr. Brad Bradley, USEPA  
Mr. Ken Miller, IEPA

March 13, 1987  
Page 3

please do not hesitate to contact the undersigned at (609)443-2405  
if you should have any comments regarding this submittal.

Very truly yours,



Stephen W. Holt  
Senior Environmental Engineer

SWH/bf  
attachments

cc: Deputy Chief  
Environmental Division  
Office of Illinois Attorney General  
500 South Second Street  
Springfield, Illinois 62706

F. R. Baser, NL Industries

F. D. Hale, O'Brien & Gere Engineers

NL Taracorp. Site  
Granite City, Illinois

Waste Pile Stratification Proposal

NL Industries proposes to conduct an investigation of the stratification of the waste pile on the Taracorp. property in Granite City, Illinois. This investigation is being completed to:

- (1) Determine if material stratification is evident in the pile and percent of material distribution (i.e. can material vs. slag).
- (2) Estimate feasibility of potential recycling.
- (3) Determination of equipment specifications and capabilities.
- (4) Identify potential operational problems and environmental impacts which might result from various activities which may be considered in the potential remedial technology investigation.

Initial concerns regarding the proposed investigation include: the control of potential fugitive air emissions, operator and personnel safety due to the proximity of power lines, and equipment decontamination.

Immediately prior to and during pile excavation with a track mounted backhoe, the pile surfaces will be moistened with a fire hose equipped with a variable stream nozzle, capable of producing a fog pattern, to control dusting during actual excavation activities, as regulated. In the unlikely event that the application of moisture, in this method, is inadequate to control the release of the fugitive emissions, all activity on the piles will cease. Excavation with the backhoe will commence within the confines of the pile, from a position on top of the pile to prevent the runoff of potentially contaminated water from the fog spray.

Operator and personnel safety will be paramount and will take precedence in any determination which may have to be made. Initially, the operator and related personnel will be required to undergo blood lead testing prior to and following the investigation activity. In addition, a level of protection will be utilized in conformance with the safety plan. This includes disposal footwear, coveralls, gloves, a full face respirator and a hard hat, as was utilized during sampling activities. Due to the proximity of power lines, along the west side of the pile, activities will be centered on the top of the pile in an area remote from any power lines.

In order to facilitate equipment decontamination, the backhoe will be "walked" up the pile on 1/2 to 3/4 inch sheets of plywood to prevent contact between the track of the backhoe and the waste pile. The backhoe bucket and any additional portions of the equipment which may have been contaminated by fugitive emissions will be washed down while remaining on top of the pile, controlling contaminated water runoff, and the unit will be "walked" off the pile, following decontamination on the referenced plywood mats.

Upon successful excavation of test holes, facilitating the identification of stratification in the pile, the material removed from the excavation will be replaced, returning the pile to its original position.

Photographs and field notations will be reviewed regarding the objectives outlined above.

SWH/bf  
4942e



**NL**

CERTIFIED MAIL -- RRR

June 23, 1987

Director, Waste Management Division  
USEPA, Region V  
Attn: Mr. Brad Bradley (5HE-12)  
230 S. Dearborn Street  
Chicago, IL 60604

Director, Illinois Environmental  
Protection Agency  
Attn: Mr. Ken M. Miller  
2200 Churchill Road  
Springfield, IL 62706

Re: NL/Taracorp Site  
Granite City, Illinois  
Bi-Monthly Progress Report

Dear Gentlemen:

This correspondence shall serve as our Third Bi-Monthly Progress Report pursuant to Section J, Paragraph 23(a), of the Administrative Order By Consent, May 14, 1985, and our submittal of the Addendum to the RI/FS Work Plan as requested by Mr. Bradley in his June 15, 1987 correspondence.

NL's previous Bi-Monthly Report incorporated a proposal to install an additional groundwater monitoring well. In response to this proposal, a meeting was held in the EPA, Region V offices on May 14, 1987, and was followed up with a telephone conference call on May 21, 1987, to finalize the NL proposal. An on-site meeting was held on June 16, 1987, to select the appropriate well locations, and alternate locations, for the two additional wells. This meeting was attended by Mr. Brad Bradley, USEPA, Region V, Mr. Ken Miller, IEPA, Mr. Mike Burnworth, Churchill & McDonnell, NL's local counsel, and the writer. Mr. Burnworth was in attendance in order to expedite the procurement of authority to install the requested monitoring wells from off-site property owners. During our meeting, various difficulties which may be encountered during efforts to obtain access were discussed.

**NL Industries, Inc.**  
Environmental Control Department  
P.O. Box 1090, Hightstown, N.J. 08520 Tel. (609) 443-2405

Mr. Brad Bradley  
Mr. Ken M. Miller

-2-


June 23, 1987

Meetings were held with representatives of well drilling contractors, on June 17, 1987, for the purpose of reviewing the selected well locations and requesting of bids for the installation of the monitoring wells.

Copies of the supporting data, as provided for by the Quality Assurance Project Plan (QAPP), were submitted on May 28, 1987, as requested by Mr. Ken Miller during our meeting of May 14, 1987. This QAPP package provides the analytical results and supporting documentation for those samples procured through April 10, 1987.

Please do not hesitate to contact me at (609) 443-2405 if you should have any questions regarding the above or the attached addendum to the RI/FS Work Plan.

Very truly yours,



Stephen W. Holt  
Senior Environmental Engineer

SWH/bt

Enclosure

cc: F. D. Hale, OBG  
M. Burnworth, C&MCD

Deputy Chief, Environmental  
Control Division  
Illinois Attorney General's Office  
500 South Second Street  
Springfield, Illinois 62706

**ADDENDUM TO WORK PLAN  
TARACORP, GRANITE CITY, ILLINOIS  
REMEDIAL INVESTIGATION**

**Background**

Two sets of ground water samples were collected as part of the Remedial Investigation at the Taracorp Site in Granite City, Illinois. The monitoring wells sampled had been installed by Taracorp and the State of Illinois. Ground water elevations in all wells were determined on four occasions. The locations of the monitoring wells screened approximately 35 feet below grade are such that triangulation to determine ground water flow direction is not feasible. The presence of cadmium and other metals in the ground water at this depth requires a better definition of ground water quality in this zone as well as a direction of flow. Therefore two additional monitoring wells are to be installed to better define ground water quality and the direction of flow in the portion of the aquifer screened by the existing "deep" wells. This Addendum to the Work Plan has been prepared relative to the additional activities presented below.

**Well Installation and Development**

Well Installation procedures will be in accordance with Attachment A at the locations identified on Figure 1. Well development will be in accordance with the procedures defined in Attachment A.

**Sampling Locations and Procedures**

After the proposed wells have been installed and developed they will be sampled in accordance with the Sampling Plan approved on July 30, 1986. The specific procedures for sampling ground water begin on page D-3 of that plan. In addition to the two new wells, four existing wells (G101, G107D, and G108S, G108D) will be sampled. Each well will be sampled twice, approximately 90 days apart. In addition, all monitoring wells on the site will have water levels determined four times approximately 30 days apart during this period to assist in determining the direction of ground water flow.

**Analytical Parameters**

Table 1 presents the Analytical program for the supplemental studies. In general, new wells will be analyzed for the full list of parameters included in the approved Work Plan for existing wells. Existing wells, as specified above to be sampled, which have been sampled on two occasions during the past year, will only include analyses for those substances detected in the wells to be sampled at concentrations within 50% of the applicable Maximum Concentration Limit (MCL), to permit correlation between the previous data and data to be obtained from the new wells. Table 1 also includes wells where field duplicate samples will be taken.

**Quality Assurance**

The management of samples after collection and specific procedures for analyses will be in accordance with the Quality Assurance Project Plan which was approved July 30, 1986.

June 18, 1987



## ATTACHMENT A

### MONITORING WELL INSTALLATION PROCEDURES

#### 1. Drilling/Sampling Procedures

Test borings shall be completed using the hollow stem auger drilling method, to a depth specified by the supervising geologist/engineer. The inside diameter of the augers shall be 3-3/4 inches. The auger stem is to be turned by a rotary drive head which is mounted on a hydraulic feed mechanism.

Samples of the encountered subsurface materials shall be collected continuously. The sampling method employed shall be ASTM D-1586/Split Barrel Sampling using either a standard 2.5' long 2" outside diameter split spoon sampler with a 140 lb. hammer or a 3" outside diameter sampler with a 300 lb. hammer.

A geologist will be on site during the drilling operations to fully describe each soil sample including 1) soil type, 2) color, 3) percent recovery, 4) moisture content, 5) odor and 6) miscellaneous observations such as organic content. The supervising geologist will be responsible for retaining a representative portion of each sample in a one pint glass jar labelled with 1) site, 2) boring number 3) interval sample/interval preserved, 4) date, 5) time of sample collection, and 6) sampling personnel. These data will be reported in the geologist's field book for later reference.

The Drilling Contractor will be responsible for obtaining accurate and representative samples, informing the supervising geologist of changes in drilling pressure, keeping a separate general log of soils encountered including blow counts (i.e. the number of blows from a soil sampling drive weight (140 pounds) required to drive the split spoon sampler in 6-inch increments) and installing monitoring wells to levels directed by the supervising geologist following specifications further outlined in this protocol.

June 17, 1987

Page 2 of 3

## II. Monitoring Well Completion

All monitoring wells will be constructed of PVC flush joint threaded well screen and riser casing (Schedule 40) that will extend from the screened interval to approximately 6" below existing grade. All joints shall be teflon taped. A #10 slot screen will be used with a compatible washed silica sandpack. Other materials utilized for completion will be bentonite pellets, a Portland cement/bentonite grout mix, a lockable, protective steel casing and a protective steel meter box that will be installed flush with existing grade.

The monitoring well installation method for 2" wells shall be to place the screen and casing assembly into the auger string once the screen interval has been selected. At that time a washed silica sand pack will be placed to 2' above the top of screen to prevent screen plugging. Bentonite pellets will then be added to a minimum thickness of two feet above the sand pack. A Portland cement/western bentonite grout (3-5% western bentonite by volume) will be added until the entire aquifer thickness has been sufficiently sealed off from horizontal and/or vertical flow above the screened interval. During placement of sand and grout, frequent measurements will be made to check the height of the sand pack and thickness of bentonite layers by a weighted tape measure.

A protective meter box with cover will be installed flush with existing grade and located above the top of the protective steel outer casing. The meter box will be secured with a Portland cement seal and pad, which will also be flush with ground level. The attached figure provides a section view of a typical flush mounted monitoring well.

The supervising geologist is responsible for recording the exact well details as relayed by the drilling contractor and actual measurement. Both the supervising geologist and drilling contractor are responsible for tabulating all well materials used such as footage of casing and screen or bags of grout, cement or sand.

A field survey control program will be conducted using standard instrument survey techniques to document well location, concrete pad, inner and outer casing elevations, in reference to mean sea level.

June 17, 1987

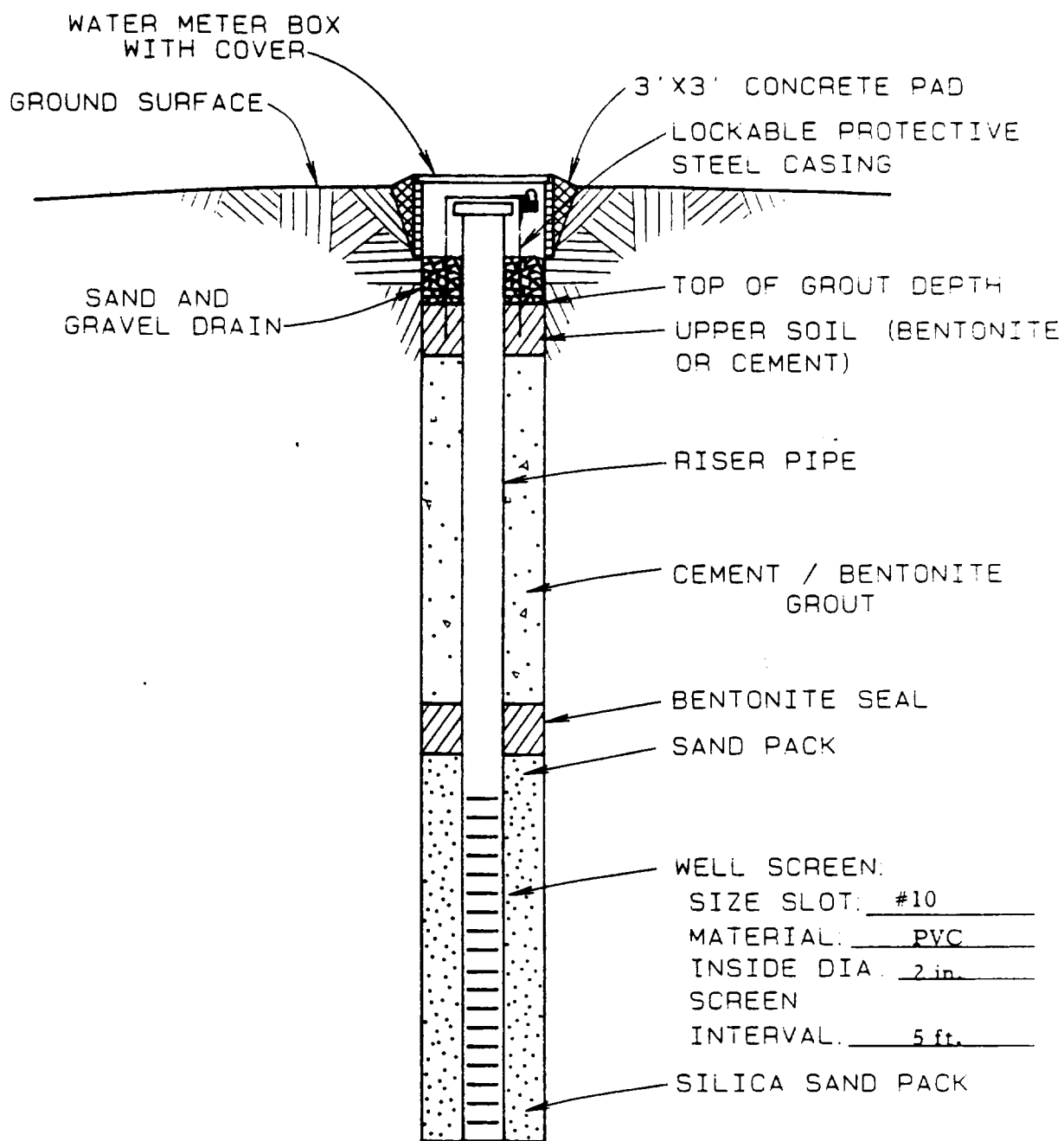
Page 3 of 3

### III. Well Development

All monitoring wells will be developed (cleared) of all fine grained materials and sediments that have settled in or around the well during installation to insure the screen is transmitting representative portions of the ground water. The development will be by one of three methods, air surging, pumping, or bailing ground water from the well until it yields relatively sediment-free water. A minimum development time of 2 hours will be applied to each well. The determination of which method to use is dependent upon the size and depth of the well and the volume of ground water in the well.

The air surging method of development consists of extending a clean polypropylene tube down into the screened portion of the well. This tube is attached to an air compressor. The compressed air displaces the water and suspends finegrained material from the well. The well is allowed to surge until the ground water clears.

If either the pumping or bailing method is used a decontaminated pump or bailer will be utilized and subsequently decontaminated after each use. Ground water will be pumped from the bottom of the well using a Keck model stainless steel submersible pump or equivalent. Bailing will utilize a stainless steel bailer and new polypropylene rope on the bailer at each well. Pumping or bailing will cease when the ground water yields sediment-free water.



TYPICAL FLUSH MOUNTED MONITORING WELL

NOT TO SCALE



**NL**

August 21, 1987

CERTIFIED MAIL - RRR

Director  
Waste Management Division  
USEPA, Region V  
Attn: Mr. Brad Bradley (5HE-12)  
230 S. Dearborn Street  
Chicago, IL 60604

Director  
Illinois Environmental Protection Agency  
Attn: Mr. Ken M. Miller  
2200 Churchill Road  
Springfield, IL 62706

Re: NL/Taracorp Site  
Granite City, Illinois  
Bi-Monthly Progress Report

Dear Gentlemen:

This correspondence shall serve as our fourth Bi-Monthly Progress Report pursuant to Section J. Paragraph 23(a), of the Administrative Order By Consent, May 14, 1985.

Access to off-site properties was obtained to permit installation and monitoring of additional groundwater wells. These wells (Nos. 109 & 110) were installed, developed, and surveyed during the week of July 27, 1987.

In addition, soil test borings were made in selected locations, circumventing the large waste pile. At this time, six Shelby tube samples were obtained for further testing.

The initial sampling of the newly installed wells, and selected existing wells, was completed on August 12, 1987, in accordance with the approved RI/FS Work Plan Addendum.

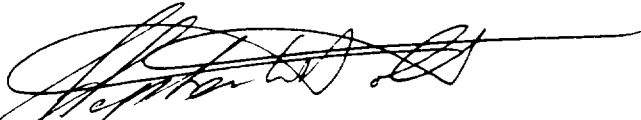
**NL Industries, Inc.**  
Environmental Control Department  
P.O. Box 1090, Hightstown, N.J. 08520 Tel. (609) 443- 2405

Director, Waste Management Div.  
USEPA, Region V  
August 21, 1987  
page -2-

The Illinois Environmental Protection Agency's comments on the O'Brien & Gere sample analysis, and related quality assurance project plan data is presently being reviewed by O'Brien & Gere's engineers. In addition, O'Brien & Gere is addressing inquiries from the Central Regional Laboratories of the U.S. Environmental Protection Agency, as relayed to the writer by Mr. Brad Bradley.

Please contact me at (609) 443-2405 if you should have any questions.

Very truly yours,



Stephen W. Holt  
Senior Environmental Engineer

SWH/tb

cc: F. D. Hale, OBG

Deputy Chief, Environmental  
Control Division  
Illinois Attorney General's Office  
500 South Second Street  
Springfield, Illinois 62706

**NL**

October 26, 1987

RECEIVED  
OCT 30 1987  
U.S. EPA. REGION V  
WASTE MANAGEMENT DIVISION  
CHICAGO, ILLINOIS 60604

CERTIFIED MAIL - RRR

Director  
Waste Management Division  
USEPA, Region V  
Attn: Mr. Brad Bradley (5HE-12)  
230 S. Dearborn Street  
Chicago, IL 60604

Director  
Illinois Environmental Protection Agency  
Attn: Mr. Ken M. Miller  
2200 Churchill Road  
Springfield, IL 62706

Re: NL/Taracorp Site  
Granite City, Illinois  
Bi-Monthly Progress Report

Dear Gentlemen:

This correspondence shall serve as our fifth Bi-Monthly Progress Report pursuant to Section J. Paragraph 23(a), of the Administrative Order By Consent, May 14, 1985.

A "Review of Data", relative to the first round of analysis conducted for the Granite City RI/FS, was submitted on September 24, 1987. This review addressed the July 22, 1987 comments of the Illinois Environmental Protection Agency.

Monthly Static Water Level readings have been procured in accordance with the approved RI/FS Work Plan Addendum. The final

**NL Industries, Inc.**  
Environmental Control Department  
P.O. Box 1090, Hightstown, N.J. 08520 Tel. (609) 443- 2405

Mr. Brad Bradley  
Mr. Ken M. Miller

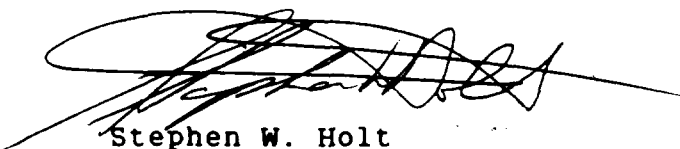
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October 26, 1987

sampling of wells, in accordance with the addendum is presently being scheduled for the week of November 9, 1987.

Please contact me at (609) 443-2405, if you should have any questions.

Very truly yours,

A handwritten signature in black ink, appearing to read "Stephen W. Holt", with a large, sweeping flourish extending to the right.

Stephen W. Holt  
Senior Environmental Engineer

SWH/bt

cc: F. D. Hale, OBG

cc: Deputy Chief, Environmental  
Control Division  
Illinois Attorney General's Office  
500 South Second Street  
Springfield, Illinois 62706

**NL**

January 11, 1988

CERTIFIED MAIL - RRR

Director  
Waste Management Division  
USEPA, Region V  
Attn: Mr. Brad Bradley (SHE-12)  
230 S. Dearborn Street  
Chicago, IL 60604

Director  
Illinois Environmental Protection Agency  
Attn: Mr. Ken M. Miller  
2200 Churchill Road  
Springfield, IL 62706

Re: NL/Taracorp Site  
Granite City, Illinois  
Bi-Monthly Progress Report

Dear Gentlemen:

This correspondence shall serve as our Sixth Bi-Monthly Progress Report pursuant to Section J. Paragraph 23(a), of the Administrative Order By Consent, May 14, 1985.

The Draft Remedial Investigation Report is being completed for submittal on January 26, 1988, in accordance with your correspondence of October 30, 1987. The report will specifically address the requirements of the Administrative Order by Consent (AOC) and will be formatted in a manner which is consistent with the "Guidance on Remedial Investigation Under CERCLA" 1985, as requested during our conference call of December 22, 1987. The report will include a compilation of responsive USEPA and IEPA "Applicable or Relevant and Appropriate Requirements" (ARAR's), as procured from the IEPA & USEPA ARAR's provided to O'Brien & Gere on November 10, 1987, for the Crab Orchard Site.

This compilation has been incorporated to expedite the RI/FS project activities. Upon review of the Draft RI Report, if it is determined that additional ARAR's are to be incorporated, this correspondence shall serve as a request for the same.

**NL Industries, Inc.**  
Environmental Control Department  
P.O. Box 1090, Hightstown, N.J. 08520 Tel. (609) 443-2405

Mr. Brad Bradley  
Mr. Ken M. Miller

-2-

January 11, 1988

Please do not hesitate to contact me at (609) 443-2405 if you should have any questions regarding the above.

Very truly yours,

A handwritten signature in dark ink, appearing to read "Stephen W. Holt", with a large, sweeping flourish extending to the right.

Stephen W. Holt  
Senior Environmental Engineer

SWH/bt

cc: F. D. Hale, OBG

Deputy Chief, Environmental  
Control Division  
Illinois Attorney General's Office  
500 South Second Street  
Springfield, Illinois 62706

**NL**

CERTIFIED MAIL - RRR

March 8, 1988

RECEIVED  
U.S. EPA, REGION V  
WASTE MANAGEMENT DIVISION  
OFFICE OF THE DIRECTOR

Director  
Waste Management Division  
USEPA, Region V  
Attn: Mr. Brad Bradley (5HE-12)  
230 S. Dearborn Street  
Chicago, IL 60604

Director  
Illinois Environmental Protection Agency  
Attn: Mr. Ken M. Miller  
2200 Churchill Road  
Springfield, IL 62706

Re: NL/Taracorp Site  
Granite City, Illinois  
Bi-Monthly Progress Report

Dear Gentlemen:

This correspondence shall serve as our seventh Bi-Monthly Progress Report pursuant to Section J. Paragraph 23(a), of the Administrative Order by Consent, May 14, 1985.

The Draft Remedial Investigation Report for the NL/Taracorp site, in Granite City, Illinois was submitted on January 26, 1988. The Illinois Environmental Protection Agency (IEPA), following their initial review, requested a two week extension for the agencies comment period on February 10, 1988.

Mr. Brad Bradley, USEPA, Region V, advised NL on March 2, 1988 that all comments on the Draft Remedial Investigation Report are presently being compiled for distribution by March 11, 1988. In addition, Mr. Bradley requested a meeting following NL's review of the comments to review the Draft Remedial Investigation Report prior to submission of the final document. Accordingly, efforts are presently being directed toward the scheduling of a meeting around March 31, 1988. This meeting date will be confirmed following NL's receipt of the agency comments.

NL Industries, Inc.  
Environmental Control Department  
P.O. Box 1090, Hightstown, N.J. 08520 Tel. (609) 443-2405

Mr. Brad Bradley  
Mr. Ken M. Miller

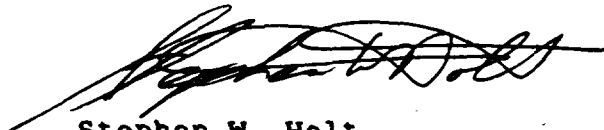
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March 8, 1988

The raw data generated during sampling rounds two, three and four were submitted on February 29, 1988 as requested by Mr. Ken Miller, IEPA.

Please do not hesitate to contact me at (609) 443-2405, if you have any questions regarding the above.

Very truly yours,



Stephen W. Holt  
Senior Environmental Engineer

SWH/bt

cc: F. D. Hale, OBG

cc: Deputy Chief Environmental  
Control Division  
Illinois Attorney General's Office  
500 South Second Street  
Springfield, Illinois 62706



**NL**

May 10, 1988

CERTIFIED MAIL - RRR

Director  
Waste Management Division  
USEPA, Region V  
Attn: Mr. Brad Bradley (5HE-12)  
230 S. Dearborn Street  
Chicago, IL 60604

Director  
Illinois Environmental Protection Agency  
Attn: Mr. Ken M. Miller  
2200 Churchill Road  
Springfield, IL 62706

Re: NL/Taracorp Site  
Granite City, Illinois  
Bi-Monthly Progress Report

Dear Gentlemen:

This correspondence shall serve as our eighth Bi-Monthly Progress Report pursuant to Section J. Paragraph 23(a), of the Administrative Order By Consent, May 14, 1985.

A project meeting was held in Chicago on April 18, 1988 to discuss the Risk Assessment portion of the Remedial Investigation (RI) report submitted on January 26, 1988. In addition, selected U.S. Environmental Protection Agency (USEPA) and Illinois Environmental Protection Agency (IEPA) comments on the Draft RI report, received on March 16, 1988, were discussed.

The IEPA and USEPA have expressed concern over the possibility that fugitive air emissions from the waste pile have involved heavy metals other than lead. In an effort to address the agencies concerns, and to expedite the RI, a table comparing the maximum potential risks represented by the different metals identified in the waste pile, using the respective maximum levels detected and the Maximum Contaminant Levels (MCL's), was presented and reviewed at the April 18, 1988 project meeting. Following the agencies rejection of this table, having been based upon MCL's, NL

**NL Industries, Inc.**  
Environmental Control Department  
P.O. Box 1090, Hightstown, N.J. 08520 Tel. (609) 443-2405

Mr. Brad Bradley  
Mr. Ken M. Miller

-2-

May 10, 1988

offered to subject the soil samples, as retained from the January 1987 sampling activities, to further analysis. This would avoid a potential twelve month delay of the RI and would provide the necessary data to address the agencies concerns.

Presently, the criteria for the re-analysis of the retained samples are being developed by the IEPA and USEPA. Following the acceptance of the re-analysis program by all parties, and the satisfactory resolution of the remaining comments on the Draft RI report, a revised project schedule can be developed to assure the expeditions completion of the RI.

Very truly yours,



Stephen W. Holt  
Senior Environmental Engineer

SWH/bt

cc: F. D. Hale, OBG

Deputy Chief, Environmental  
Control Division  
Illinois Attorney General's Office  
500 South Second Street  
Springfield, Illinois 62706

**NL**

July 8, 1988, 1988

CERTIFIED MAIL - RRR

Director  
Waste Management Division  
USEPA, Region V  
Attn: Mr. Brad Bradley (5HE-12)  
230 S. Dearborn Street  
Chicago, IL 60604

Director  
Illinois Environmental Protection Agency  
Attn: Mr. Ken M. Miller  
2200 Churchill Road  
Springfield, IL 62706

Re: NL/Taracorp Site  
Granite City, Illinois  
Bi-Monthly Progress Report

Dear Gentlemen:

This correspondence shall serve as our ninth Bi-Monthly Progress Report pursuant to Section J. Paragraph 23(a), of the Administrative Order By Consent, May 14, 1985.

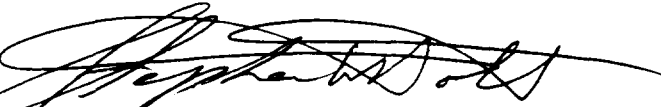
Since are last Bi-Monthly Progress Report the criteria for the re-analysis of retained soil samples for the 0-3 inch strata has been established. Re-analysis activities are presently underway with the submittal of the analytical results scheduled for July 25, 1988. This submittal date is consistent with the revised schedule, agreed to on July 1, 1988. This revised schedule also indicates the Final Remedial Investigation Report is scheduled for submittal on September 21, 1988.

**NL Industries, Inc.**  
Environmental Control Department  
P.O. Box 1090, Hightstown, N.J. 08520 Tel. (609) 443- 2405

Mr. Brad Bradley  
Mr. Ken M. Miller  
Page -2-

NL continues to believe that the project meeting, to review agency comments on the draft RI report, as recommended on April 18 and requested in our correspondence of June 6, 1988, would be beneficial and would assist in expediting the completion and acceptance of the final remedial investigation report. Accordingly, please advise NL as to your availability prior to August 12, 1988.

Very truly yours,



Stephen W. Holt  
Senior Environmental Engineer

SWH/lmp

cc: F. D. Hale, OBG

Deputy Chief,  
Environmental Control Division  
Illinois Attorney General's Office  
500 South Second Street  
Springfield, Illinois 62706

**NL**

FEDERAL EXPRESS

September 26, 1988

Director  
Waste Management Division  
USEPA, Region V  
Attn: Mr. Brad Bradley (SHE-12)  
230 S. Dearborn Street  
Chicago, IL 60604

Director  
Illinois Environmental Protection Agency  
Attn: Mr. Ken M. Miller  
2200 Churchill Road  
Springfield, IL 62706

Re: NL/Taracorp Site  
Granite City, Illinois  
Bi-Monthly Progress Report

Dear Gentlemen:

This correspondence shall serve as our tenth Bi-Monthly Progress Report pursuant to Section J. Paragraph 23(a). of the Administrative Order By Consent, May 14, 1985, and shall serve to transmit the Final Remedial Investigation Report.

A meeting was held in Chicago on August 3rd and 4th, 1988, as requested in NL's previous bi-monthly progress report, to review U.S. Environmental Protection Agency, Region V (US EPA), and Illinois Environmental Protection Agency (IEPA) comments on the Draft Remedial Investigation Report-Risk Assessment.

NL submitted an interim document August 18th, 1988, in response to specific comments and agreements reached during the referenced meeting. Mr. Bradley's correspondence to Mr. Frank D. Hale, O'Brien and Gere Engineers, September 7, 1988, responded to this submittal and expressed an apparent reversal in the USEPA and IEPA position, regarding the Risk Assessment.

**NL Industries, Inc.**  
Environmental Control Department  
P.O. Box 1090, Hightstown, N.J. 08520 Tel. (609) 4432405

Discussions over the past several months have concentrated on the establishment of acceptable criteria for developing Site specific Risk Assessments in accordance with the "Superfund Public Health Evaluation Manual" (SPHEM) (EPA/540/1-86/060, October 1986). This apparent reversal of the US EPA/IEPA position appears to circumvent any attempt to complete a Risk Assessment for lead, in accordance with the SPHEM. (However, the SPHEM will be followed for the completion of Risk Assessments for inorganic contaminants, other than lead.) This position is therefore inconsistent with the SPHEM and incorrectly endeavors to identify a Center for Disease Control (CDC) document (Preventing Lead Poisoning in Children, January 1985) as a "site specific risk assessment."

In an effort to expedite the Remedial Investigation approval process, the attached Final Remedial Investigation Report does not provide specific quantifiable Response Objectives within the Remedial Response Objectives section. However, this section refers to the Risk Assessment for the Remedial Response Objectives, as agreed to with Mr. Bradley on September 21, 1988.

Very truly yours,



Stephen W. Holt  
Senior Environmental Engineer

SWH/lmp

cc: B. Bradley - Orig + 4  
F. Hale - OBG  
K. Miller - Orig + 4

Deputy Chief, Environmental  
Control Division  
Illinois Attorney General's Office  
500 South Second Street  
Springfield, Illinois 62706

**NL**

**RECEIVED**  
NOV 21 1988  
REMEDIAL & ENFORCEMENT  
RESPONSE BRANCH

November 14, 1988

CERTIFIED MAIL - RRR

Director  
Waste Management Division  
USEPA, Region V  
Attn: Mr. Brad Bradley (5HE-12)  
230 S. Dearborn Street  
Chicago, IL 60604

Director  
Illinois Environmental Protection Agency  
Attn: Mr. Ken M. Miller  
2200 Churchill Road  
Springfield, IL 62706

Re: NL/Taracorp Site  
Granite City, Illinois  
Bi-Monthly Progress Report

Dear Gentlemen:

This correspondence shall serve as our Seventh Bi-Monthly Progress Report pursuant to Section J. Paragraph 23(a), of the Administrative Order By Consent, May 14, 1985.

NL Industries, Inc. (NL) submitted the Final Remedial Investigation Report for the referenced site on September 26, 1988. NL received Mr. Bradley's correspondence, on behalf of the U.S. Environmental Protection Agency and the Illinois Environmental Protection Agency (the Agencies) regarding the disapproval of the referenced report, on November 8, 1988.

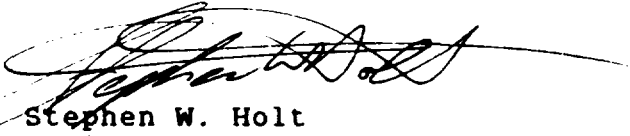
Whereas the Agencies' recent submittal incorrectly identifies paragraph 17 of the "Agreement and signed Administrative Order by Consent," NL will respond to the referenced disapproval within thirty calendar days, pursuant to paragraph 16 of the Order.

**NL Industries, Inc.**  
Environmental Control Department  
P.O. Box 1090, Hightstown, N.J. 08520 Tel. (609) 443-2405

Mr. Brad Bradley  
November 15, 1988  
Page -2-

Please contact me at (609) 443-2405 if you should have any questions or comments concerning this submittal.

Very truly yours,



Stephen W. Holt  
Senior Environmental Engineer

SWH/lmp

cc: F.D. Hale, OBG

Deputy Chief, Environmental  
Control Division  
Illinois Attorney General's Office  
500 South Second Street  
Springfield, Illinois 62706



**NL**

CERTIFIED MAIL - RRR

January 10, 1989

Director  
Waste Management Division  
USEPA, Region V  
Attn: Mr. Brad Bradley (5HE-12)  
230 S. Dearborn Street  
Chicago, IL 60604

Director  
Illinois Environmental Protection Agency  
Attn: Mr. Ken M. Miller  
2200 Churchill Road  
Springfield, IL 62706

Re: NL/Taracorp Site  
Granite City, Illinois  
Bi-Monthly Progress Report

Dear Gentlemen:

This correspondence shall serve as our eighth Bi-Monthly Progress Report pursuant to Section J. Paragraph 23(a), of the Administrative Order By Consent, May 14, 1985.

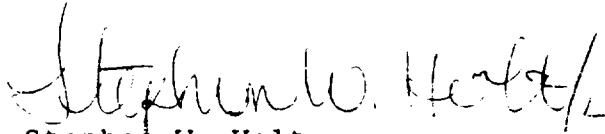
A meeting was held in Chicago, on December 8, 1988, to discuss the Risk Assessment as presented in the Final Remedial Investigation Report, September 26, 1988, and the Agency's correspondence of November 4, 1988, in an effort to avoid potential disputes and project delays. On December 16, 1988, Ms. Bonni Kauffman, outside counsel for NL Industries, confirmed the agreements reached during our meeting and provided documents in support of the referenced Risk Assessment.

**NL Industries, Inc.**  
Environmental Control Department  
P.O. Box 1090, Hightstown, N.J. 08520 Tel. (609) 443-2405

Mr. Brad Bradley  
January 10, 1989  
Page 2

Pursuant to telephone conversation between Mr. Brad Bradley, U.S. EPA, Region V, and the writer, on January 6, 1988, NL anticipates receipt of the Agency's final approval of the September 26, 1988 Remedial Investigation Report.

Very truly yours,

A handwritten signature in cursive script, reading "Stephen W. Holt".

Stephen W. Holt  
Senior Environmental Engineer

SWH/wd

cc: F.D. Hale, OBG

Deputy Chief, Environmental  
Control Division  
Illinois Attorney General's Office  
500 South Second Street  
Springfield, Illinois 62706

**NL**

Certified Mail - RRR

March 14, 1989

Director, Waste Management Division  
USEPA, Region V  
Attn: Mr. Brad Bradley (5HE-12)  
230 S. Dearborn Street  
Chicago, IL 60604

Director, Illinois Environmental  
Protection Agency  
Attn: Mr. Ken M. Miller  
2200 Churchill Road  
Springfield, IL 62706

Re: NL/Taracorp Site  
Granite City, Illinois  
Bi-Monthly Progress Report

Dear Gentlemen:

This correspondence shall serve as our ninth Bi-Monthly Progress Report pursuant to Section J, Paragraph 23(a), of the Administrative Order by Consent, May 14, 1985, and our submittal.

Following the agencies' approval of the Final Remedial Investigation Report (September, 1988), on February 6, 1989, NL presented to the U.S. EPA and the Illinois EPA the established remedial response objectives and identified various remedial alternatives, during the February 8, 1989 meeting in Chicago.

During this meeting, the agencies requested that the number of response alternatives presented be composited, and that further attention be directed towards verification of groundwater well utilization within the study area.

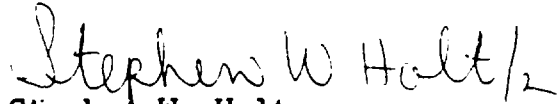
**NL Industries, Inc.**  
Environmental Control Department  
P.O. Box 1090, Hightstown, N.J. 08520 Tel. (609) 443-2405

Mr. Brad Bradley  
March 14, 1989  
Page -2-

Mr. Frank D. Hale, O'Brien & Gere Engineers, Inc., has accordingly requested pertinent information from Ms. Mon and Ms. Woller, IEPA, as suggested by Mr. Miller during our meeting. Information was received by Mr. Hale on March 7, 1989, in response to his request. This information is presently being reviewed for incorporation in the confirmation letter as specified in paragraph 14(b)(4) of the Agreement and Administrative Order by Consent.

Please do not hesitate to contact me at (609) 443-2405 if you should have any questions or comments concerning this submittal.

Very truly yours,

A handwritten signature in cursive script that reads "Stephen W Holt / 2".

Stephen W. Holt  
Senior Environmental Engineer

SWH/lp

cc: F.D. Hale, OBG

Deputy Chief, Environmental  
Control Division  
Illinois Attorney General's Office  
500 South Second Street  
Springfield, Illinois 62706

**NL**

CERTIFIED MAIL - RRR

May 10, 1989

Director, Waste Management Division  
USEPA, Region V  
ATTN: Mr. Brad Bradley (SHE-12)  
230 S. Dearborn Street  
Chicago, IL 62706

Director, Illinois Environmental  
Protection Agency  
Attn: Mr. Ken M. Miller  
2200 Churchill Road  
Springfield, IL 62706

Re: NL/Taracorp Site  
Granite City, Illinois  
Bi-Monthly Progress Report

Dear Gentlemen:

This correspondence shall serve as our tenth Bi-Monthly Progress Report pursuant to Section J. Paragraph 23(a)., of the Administrative Order By Consent, May 14, 1985.

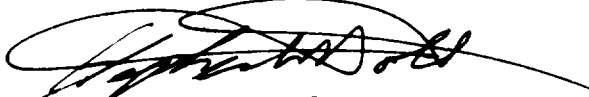
Pursuant to Paragraph 14(b)(5) of the Administrative Order By Consent, May 14, 1985, the Alternative Development Report was submitted on April 18, 1989. In an effort to expedite project activities, this report addresses Task 9-11, of the Feasibility Study, Statement of Work. Accordingly, pursuant to a telephone conversation with Mr. Brad Bradley, USEPA, Region V, April 25, 1989, the "initial Screening of Alternatives" meeting, as specified by Paragraph 14(b)(5) of the order has been determined to be unnecessary by the USEPA and the Illinois EPA. The next order mandated submittal will, therefore, consist of the Draft Preliminary Feasibility Study Report, as described under Task 13 (e). This report is presently scheduled for submission on August 25, 1989; being subject to adjustment, in the event that agency comments on the Alternative Development Report (presently anticipated during the week of June 12, 1989) requires additional work or interim submittals.

**NL Industries, Inc.**  
Corporate Environmental Services  
P.O. Box 1090, Hightstown, N.J. 08520 Tel. (609) 443-2405

May 10, 1989  
Page -2-

Please do not hesitate to contact me at (609) 443-2405 if you should have any questions regarding the above.

Very truly yours,

A handwritten signature in black ink, appearing to read "Stephen W. Holt", written over a horizontal line.

Stephen W. Holt  
Senior Environmental Engineer

SWH/lon

cc: F. D. Hale, OBG

Deputy Chief, Environmental  
Control Division  
Illinois Attorney General's Office  
500 South Second Street  
Springfield, Illinois 62706

**NL**

CERTIFIED MAIL - RRR

July 20, 1989

Director, Waste Management Division  
USEPA, Region V  
Attn: Mr. Brad Bradley (5HE-12)  
230 S. Dearborn Street  
Chicago, IL 60604

Director, Illinois Environmental  
Protection Agency  
Attn: Mr. Ken M. Miller  
2200 Churchill Road  
Springfield, IL 62706

Re: NL/Taracorp Site  
Granite city, Illinois  
Bi-Monthly Progress Report

Dear Gentlemen:

This correspondence shall serve as our eleventh Bi-Monthly Progress Report pursuant to Section J, Paragraph 23(a), of the Administrative Order by Consent, May 14, 1985.

NL Industries received, via telefax, Mr. Bradley's "informal-hand written" comments on the Alternative Development Report, on June 23, 1989. O'Brien & Gere Engineers (OBG) is presently reviewing Mr. Bradley's comments, as they relate to the Draft Preliminary Feasibility Study Report, scheduled for submission on August 25, 1989.

NL understands that both Mr. Bradley, USEPA, Region V, and Mr. Miller, IEPA, visited the site and surrounding areas during the week of July 10th. At which time, Mr. Bradley and Mr. Miller endeavored to identify/clarify the location and utilization of offsite wells. Since Mr. Bradley is scheduled to be on vacation between July 17 and August 14, 1989, we do not anticipate receipt of comments from Mr. Bradley until after August 14th. This would prohibit the timely modification and submission of the Draft Preliminary Feasibility Study Report.

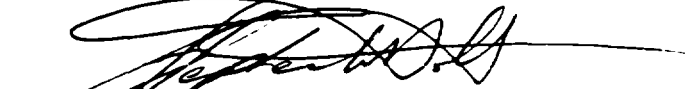
**NL Industries, Inc.**  
Corporate Environmental Services  
P.O. Box 1090, Hightstown, N.J. 08520 Tel. (609) 443-2405

July 20, 1989  
Page -2-

In the event that either of the above referenced activities indicate that modifications to the "Draft Preliminary Feasibility Study Report" are in order, an extension on the August 25 submittal date may be required. Disregarding any need for such modification, we anticipate submission of the Draft Preliminary Feasibility Study Report on schedule.

Please do not hesitate to contact me at (609)443-2405 if you should have any questions regarding the above.

Very truly yours,



Stephen W. Holt  
Senior Environmental Engineer

SWH/lmn

cc: F.D. Hale, OBG

Deputy Chief, Environmental  
Control Division  
Illinois Attorney General's Office  
500 South Second Street  
Springfield, Illinois 62706



**NL**

CERTIFIED MAIL - RRR

September 8, 1989

Director, Waste Management Division  
USEPA, Region V  
Attn: Mr. Brad Bradley (5HE-12)  
230 S. Dearborn Street  
Chicago, IL 60604

Director, Illinois Environmental  
Protection Agency  
Attn: Mr. Ken M. Miller  
2200 Churchill Road  
Springfield, IL 62706

Re: NL/Taracorp Site  
Granite City, Illinois  
Bi-Monthly Progress Report

Dear Gentlemen:

This correspondence shall serve as our twelfth Bi-Monthly Progress Report pursuant to Section J, Paragraph 23(a), of the Administrative Order By Consent, May 14, 1985.

The Draft Preliminary Feasibility Study Report was submitted for agency review on August 25, 1989 as scheduled; satisfying Paragraph 14(b)(7) of the Order.

A copy of Mr. Miller's survey data regarding downgradient off site wells, August 30, 1989, has been provided to Mr. Hale, O'Brien & Gere Engineers for summation and inclusion in the Final Preliminary Feasibility Study Report. The data provided indicates that no private wells, located downgradient from the site, have been identified to be in use for potable purposes.

**NL Industries, Inc.**  
Corporate Environmental Services  
P.O. Box 1090, Hightstown, N.J. 08520 Tel. (609) 443-2405

RI/FS Monthly  
September 8, 1989  
Page -2-

Please do not hesitate to contact me at (609) 443-2405 if  
you should have any questions regarding the above.

Very truly yours,



Stephen W. Holt  
Senior Environmental Engineer

SWH/ajd

Enclosure

cc: F.D. Hale, OBG

Deputy Chief, Environmental  
Control Division  
Illinois Attorney General's Office  
500 South Second Street  
Springfield, Illinois 62706

**NL**

CERTIFIED MAIL - RRR

November 10, 1989

Director, Waste Management Division  
USEPA, Region V  
Attn: Mr. Brad Bradley (5HE-12)  
230 S. Dearborn Street  
Chicago, IL 60604

Director, Illinois Environmental  
Protection Agency  
Attn: Mr. Ken M. Miller  
2200 Churchill Road  
Springfield, IL 62706

Re: Taracorp Site  
Granite City, Illinois  
Bi-Monthly Progress Report

Dear Gentlemen:

This correspondence shall serve as our Thirteenth Bi-Monthly Progress Report pursuant to Section J, Paragraph 23(a), of the Agreement and Administrative Order by Consent, May 14, 1985 ("Agreement").

NL Industries, Inc. ("NL") received Mr. Bradley's October 3, 1989 correspondence transmitting agency comments on the "Draft Preliminary Feasibility Study Report", as submitted by O'Brien & Gere Engineers ("OBG") on behalf of NL, on October 4, 1989.

Following NL's review of the referenced comments, a meeting was held in EPA, Region V, Chicago offices, on October 30, 1989 to provide for a discussion on the subject report and Agency comments. During this meeting, the Illinois Environmental Protection Agency (IEPA) provided NL and/or OBG with additional information and displayed a "preliminary" Soil-lead isopleth.

Due to the additional materials and information received during the October 30th meeting, Mr. Bradley was advised on November 2, 1989, that NL will require additional time to submit formal responses to the agency comments. Presently, we anticipate submittal of NL's responses pursuant to paragraph 16, of the Agreement no later than November 17, 1989.


**NL Industries, Inc.**  
Corporate Environmental Services  
P.O. Box 1090, Hightstown, N.J. 08520 Tel. (609) 443-2405

Page -2-

During our meeting of October 30, 1989, you requested the names and addresses of suppliers of lead scrap materials for the subject site. Accordingly, a composite of "NL Secondaries" is attached.

Please do not hesitate to contact me at (609) 443-2405 if you should have any questions regarding the above.

Very truly yours,



Stephen W. Holt  
Senior Environmental Engineer

SWH/lmn  
Attachment

cc: F.D. Hale, OBG  
B.F. Kaufman, Willkie, Farr & Gallagher

Deputy Chief, Environmental  
Control Division  
Illinois Attorney General's Office  
500 South Second Street  
Springfield, Illinois 62706

N.L. SECONDARIES

Names and Addresses of Supplier of  
Non-Virgin Material to Granite City, Illinois

A. Miller & Company	PO Box 695 Peoria, Illinois 61652
A. Tenenbaum	4500 Bethany Road N. Little Rock, AR 72117
Aaron Ferer & Sons Co.	POB 6478 Church St. Station NY, NY 10249
A.B.F. Metal Co.	St. Louis, MO.
Ace Comb Company	West 2nd Street, Booneville, AR 72927
Ace Scrap Metal Processors	3100 N. Broadway St. Louis, MO. 63147
Acme Battery Manufacturing Company	3340 Morganford St. Louis, MO. 63110
Acro Sales & Engineering, Inc.	W 137 N. 5540 Williams Place, Menomonee Falls WI 53051
Active Metal Company	5150 16th Street, Detroit, MI 66208
Aetna Metals, Inc.	13535, Helen Street, Detroit, MI 48212
Afram Bros, Co.	900 South Water Street, Milwaukee, WI 53204
Allied Metal Company	2059 South Canal Street, Chicago, Il 60616
Alter Company	2333 Rockingham Road, Davenport IA 53808
Alumax Foils	No address given

Amax Lead and Zinc <sup>1</sup>	Amax Inc./Amax Lead and Zinc 200 Park Avenue NY, NY 10166
American Can Co.	755 Prior Avenue St. Paul, MN 55104
American Industrial Linings, Inc.	1390 Kingsland Avenue St. Louis, MO. 63133
American Smelting & Refining Company	120 Broadway, NY, NY 10005
Ametalco Inc.	Amax Inc./ Ametalco Inc. 200 Park Avenue NY, NY 10166
Andersen Steel, Inc.	POB 448 Fairfield, IA 52566
Anzon America, Inc.	Freehold, NJ
A.O. Smith Corp.	POB 28 Kankakee, IL
Asarco, Inc. <sup>2</sup>	POB 7019 Church Street Station, NY, NY 10008
Astron Manufacturing Co.	12th and Mc Kinney Streets Chicago, IL
Associated Metals & Minerals corp	733 Third Avenue NY, NY 10017
Baker Iron & Metal	Box 11040 Lexington, KY 40511
Barter Machinery & Supply Co.	215 Santa Fe Drive Denver, CO 80223

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<sup>1</sup> Amax Lead and Zinc receipts were as follows: 12 receipts of "corroding" lead; 1 of Anodes; 12 of Scrap Anodes; 1 of AG Dross; 1 of AG Scrap; 1 of Desilverized lead; 1 of Scrap Silver Lead.

<sup>2</sup> Asarco, Inc. supplied mainly virgin materials but also "common lead" and 2 Bdl's of lead - type unspecified.

Batco Inc.	7777, Bon Homme Clayton, MO 63105
Bear Manufacturing	PO Box 10159 Rock Island, IL 62201
Becker Metals Corp.	PO Box 14008-B St. Louis, MO 63178
Bell City Battery Company	915 South Charles Street Belleville, IL 62221
Ben Greenberg Co.	POB. 450 Dyersburg, TN 38024
Benjamin Air Rifle Co.	1525 South 8th Street, St. Louis, MO 63104
Berlinski & Sons	POB 733 Juliet, IL 60434
Bill Bergmeyer	R.R.2 Box 238 Bowling Green, MO 63334
Billiton Metals & Ores	POB 1156 Church St. Station NY, NY 10249
Bill's Auto Parts	471 South Capital Ave. Gerydon, IN 47112
Bill's Salvage	POB 398 Cobden, IL 62920
Billy Morrow	Box 132 Hurdland, MO 63547
Bob Keller Batteries Warehouse	2671 Washington St. Louis, MO 63103
Briggs Used Auto Parts	7 W. Buckeye Casey, IL 62420
Bunker Hill Company	Pintlar Corp/Bunker Hill Company 505 Front Ave., Suite 303 PO Box 2199 Coeur d'Alene Idaho 83814
Burlington	Granite City

Bussman Manufacturing Company a division of Mc Graw-Edison Co.	2536 W. University St. Louis, MO 63107
Call Pub. Co. Inc.	9, N. Division Street, Duquoin, IL 62832
Campbell Soup	Campbell Place Camden, NJ 08101-0391
CBC Inc.	3001, Fairfax Traffic Way Kansas City, KS 66115
Central Iron & Metal Company	PO Box 1180 Springfield, IL 62705
Central Salvage	1433 NW 5th Street Oklahoma City, OK 73106
Central Waste Materials	1510 N. Broadway St. Louis, MO.
Centritech Corporation	PO Box 14552 Houston, TX 77021
Cerro Copper Products	PO Box 93739 Chicago, IL 60670
Chanen's Inc.	PO Box 766 Quincy, IL 62301
Charles W. Johnson	503 N. Sangamon Lincoln, IL 62656
Chemetco	PO Box 187 Alton, IL 62002
Chicago Battery	No address given
Chrysler Corp.	1001 N. Highway Drive Fenton, MO 63026
C.L. Downey Company	9th and Colfax Avenue Hannibal, MO 63401
CNC Industries, Inc.	330 Crossen Elk Grove Village, IL 60007
Comfort Printing and Stationery Co.	1611 Locust Street St. Louis, MO 63106



Cominco Ltd <sup>3</sup>	1) POB 93929 Chicago, IL 60676
	2) 120 Adelaide St. West Toronto, Ontario Canada M5H 1T1
Commercial Metals Co.	P.O. Box 1046 Dallas, TX 75221-1046
Consolidated Wastes Material	6730 Wilson Road Kansas City, MO 64125
Continental Can Company	800 Connecticut Ave. P.O. Box 5410 Norwalk, CT 06856
Cosco Graphics	11548 Adie Road Maryland Heights, MO.
Crown Cork & Seal Co.	3501 West 31st Street Chicago, IL 60623
D. Pollack & Sons	1509 West Cortland Chicago, IL 60622
Del Rich Battery & Metal Co.	510 Schmidt Road Davenport, IA 52808
Delco-Remy; Division of General Motors Corp.	General Motors Corporation/ Delco Remy Division 3031 West Grand Blvd. P.O. Box 33122 Detroit, MI 48232
Delta Metals & Paper Recycling, Inc.	1436 Mullanphy St. Louis, MO 63106
Diversified Metals	1034 S. Brentwood Blvd. Richmond Heights, MO 63117
Don Hibbeler	12814 Sycamore Lane Palos Heights, IL 60463

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<sup>3</sup> Cominco Ltd. receipts as follows: 6 of Corroding Lead; 1 of Virgin Lead; 6 of Antimonial Lead; 10 of Antimony; 10 of Lead.

Dudley Auto Radiator	1509 7th Street Madison, IL
Ed Parkinson	129 South Ely Mounds, IL 62964
Edwardsville Intelligencer	117 N. 2nd Street Edwardsville, IL 62025
E.J. Pfeifer Iron & Metal	522 S. First Stockton, KS 67669
Elden R. Erickson & Sons, Inc.	5383 Swanson Road Roscoe, IL 61073
Equipment Engineering Company	No address given
ESB Inc.	Exide Corp./ESB Inc. P.O. Box 14205 Reading, PA 19162-4205
Essex Group	N. Manchester
Fabricators Int.	No address given
Farmland	No address given
Far West Sport	13313 Reeder Road S.W. Olympia, WA 98502
Federal Alloys Corp.	2930 Denton Street Detroit, MI 48211
Federal Cartridge Corporation	1) 9th and Tyler Street Anoka, MN 55303 2) Buick, MO 3) Omaha, NE
Federal Iron & Metal	6820 St. Charles Rock Road St. Louis, MO 63133
Feinberg Bros. Iron & Metal	1335 Cypress Kansas City, MO 64127
Finer Metal Co.	5900 Manchester Ave. St. Louis, MO 63110
Fisher Body Division of General Motors Corporation	General Motors Corporation/ Fisher Body Division 3031 West Grand Blvd.

	P.O. Box 33122 Detroit, MI 48232
Ford Motor Company	Parklane Towers West Suite 401 One Parklane Blvd Dearborn, MI 48126
Fundamental Metals & Minerals	30 Rockefeller Plaza Suite 1933 New York, NY 10020
Gary's Metal	RR 3, Box 290 Carterville, IL 62918
Gebco	Granite City, IL
General Battery Corp.	Exide Corp./General Battery Corp. POB 14205 Reading, PA 19162-4205
General Motors Corporation	3031 West Grand Blvd. P.O. Box 33122 Detroit, MI 48232
General Waste Products, Inc.	201 South 7th Ave. Evansville, IN 47730
Globe Union	Johnson Controls Inc/ Globe Union 5757 N. Green Bay Avenue P.O. Box 591 Milwaukee, WI 53201
Glosser Metal Company	P.O. Box 114 Hidalgo, IL 62432
Gopher Smelting & Refining	3385 Highway 49 St. Paul, MN 55121
Gould Inc.	Ten Gould Center Rolling Meadows, IL 60008
Graham Metal Corporation	412 Graham Avenue Benton Harbor, MI 49022
Great Lakes Carbon Corporation	P.O. Box 86 St. Louis, MO 63166

Grossman Metals Corp.	5 North Market Street St. Louis, MO 63102
GSA	No address given
GT Metals	Rd. 4, Box 400-B Muskogee, OK 74401
H. Brecker & Son	P.O.B. 28 Platteville, WI 53818
H.C. Duke & Son, Inc.	2116 Eighth Ave. East Moline, IL 61244
Henry Rautbort	517 West VanBuren Clinton, IL 61727
Highland Park Waste Material	1466 Berkeley Road Highland Park, IL 60035
Houston Salvage	1355 West Highway 17 Houston, MO 65483
H.S. Kaplan Scrap Iron & Metal	P.O.B. 3626 St. Paul, MN 55165
Hunter's Reloading Supply	1210 St. Michael Street Cahokia, IL 62206
ICC Metals Co.	New York, NY
Imperial Smelting Corporation	1031 E. 103rd Street Chicago, IL 60628
Indussa	New York, NY
Industrial Chemicals Corp.	720 5th Avenue New York, NY 10019
Inland Metals Refining Co.	651 East 119th Street Chicago, IL 60628
InterCity Metal Co.	8400 Truman Road Kansas City, MO
Intsel Corporation	835 3rd Avenue New York, NY 10022
J. Soloman & Sons	17th and Cedar Street Cairo, IL 62914

J. Trockman & Sons, Inc.	Highway 41 South Evansville, IN 47702
James H. Tessem	1705 N.E. Perry Peoria, IL 61603
Jay Metal Processing	1302 NE 29th Forth Worth, TX 76106
Johnson Metal Co.	3056 Hamilton Ave. Racine, WI 53403
Kamen Iron & Metal Co.	P.O. Box 485 Wichita, KS 67214
Kansas City Battery Company	744 Southwest Blvd. Kansas City, KS 66103
Kemco Metal Processing	123 Byasse Drive Hazelwood, MO 63042
Kennecott Refining Corp.	Baltimore, MD
Kraft Chemical Company	917 West 18th Street Chicago, IL 60508
K.W. Battery <sup>4</sup>	3555 Howard Street Skokie, IL 60076
L. Kahn & Son	P.O. Box 569 Havanna, IL
LaSalle Steel Co.	1412 E. 150th Street Hammond, IN 46327
Ladyman Engineering Enterprises	723 Kirkwood Drive Dallas, TX 76128
Larry Good & Company	260 Old State Road Ellisville, MO 63011
Lefton Iron & Metal Company	P.O. Box 219 East St. Louis, IL 62202
Leslie Cooper Battery & Metal	P.O. Box 4166 Davenport, IA 52808

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<sup>4</sup> Present communications address for K.W. Battery: c/o Janice M. Edwards, Mc Dermott Will & Emery, 111 West Monroe Street, Chicago IL 60603.

Lissner Corporation	1000 North Branch Chicago, IL 60622
Lopez Scrap Metal, Inc.	P.O. Box 17741 El Paso, TX 79917
M. Gervich & Son, Inc.	707 E. Nevada Street P.O. Box 67 Marshalltown, IA 50158
M. Katch	Topeka, KS
M. Ruben Metal Co.	2416 So. Archer Ave. Chicago, IL 60616
MacGlashen Enterprises	1641 So. Sinclair Anaheim, CA 92806
Madewell & Madewell <sup>5</sup>	P.O. Box 386 Jones, OK 73049
Madewell Metals Corporation	310 Shawnee Bypass Box 1432 Muskogee, OK 74401
Madison Scale	Madison, IL
Mallin Bros. Co.	3211 Gardner Avenue Kansas City, MO 64120
Marchem Resources, Inc.	P.O. Box 35361 Houston, TX 77035
Marco Steel Supply	302 S. Market St. Champaign, IL 61820
Mardians, Inc.	P.O. Box 370 Mobridge, SD 57601
Max Schwartzman & Sons, Inc.	2905 North Ferry Anoka, MN 55303
McDonnell - Douglas	No address given

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<sup>5</sup> Present communications address for Madewell & Madewell: c/o Wesley C. Fredenburg, Esq., Crowe & Dunlevy, 1800 Mid-American Tower, 20 North Broadway, Oklahoma City OK 73102.

McGraw - Edison Co.	502 Earth City Plaza P.O. Box 14460 St. Louis, MO 63178
McKinley Iron Co.	3620 North Hall Street St. Louis, MO 64147
Meyer Battery Service	1004 E. 12th Street Joplin, MO
Mid-Missouri Metal	P.O. Box 247 Wentzville, MO 63385
Mike Fanow	2815 Park Place West, Cano, IL 62914
Milford Rivet & Machine Co.	111 Taylor Street Elyria, OH 44035
Minera Mexico International	P.O. Box 4452 New York, NY
Minor Metals, Inc.	New York, NY
Missouri Iron & Metal	754 S. 4th St. St. Joseph, MO 64501
Mitachi	No address given
Modern Printing Company	2617 Oliver Street St. Louis, MO 63103
Modine Manufacturing Co.	1500 Dekoven Avenue Racine, WI 53401
Morris Tick Company, Inc.	501 East Stewart Bloomington, IL 61701
M.S. Kaplan Company	111 East Wacker Drive Chicago, IL 60601
Murphysboro Iron & Metal	1700-1900 Gartside Murphysboro, IL 62966
Nassau Recycle Corp.	AT&T/Nassau Recycle Corp. Room 3WA-148 1 Oakway Berkley Heights, NJ 07922

Nassau Smelting & Refining Corp.	At&T/Nassau Smelting & Refining Corp. Room 3WA-148 1 Oakway Berkley Heights, NJ 07922
National Can Corp.	8101 Higgins Road Chicago, IL 60631
National Metal Company	8339 Lowell Avenue Skokie, IL 60076
National Typographers Inc.	914 Pine Street St. Louis, MO 63101
New Castle Junk Co.	New Castle, PA
New Orleans Public Service, Inc.	P.O. Box 60340 New Orleans
Norms Metal Co.	Louisville, KY
Northbrook Sports Club	Northbrook, IL
Northern Metals Inc.	70 Dock Street St. Louis, MO 63147
Northwestern Bell Telephone Co.	100 S.W. 9th Ave. New Brighton, MN
Northwestern Iron & Metal	438-440 Lake Ave. South Duluth, MN 56802
O'Dell Iron & Metal	100 State Street Madison, IL 62060
Ohio New & Rebuilt	P.O. Box 328 Wapakonite, OH 45859
Okon Iron & Metal Co.	4801 South Lamar P.O. Box 15724 Dallas, TX 75215
Olin Corp.	East Alton, IL 62024
Otis Radio Electric Corp.	1102 Silver Lake Cary, IL 60013
Otto Lerch	415 Hillsboro Farmington, MO 63640



Overland Metals, Inc.	8510 Lackland Road Overland, MO 63114
Palmer-Johnson	No address given
Parkans International Inc.	P.O. Box 15519 5221 Armour Drive Houston, TX 77020
Peoria Battery	Peoria, IL
Pet, Inc.	400 South 4th Street St. Louis, MO 63166
Phelps Dodge	El Paso, TX
Philipp Bros.	1) 8131 Monticello Avenue Skokie, IL 60076 2) 1221 Ave. of the Americas New York, NY 10020
Piolet Bros.	P.O. Box 12 McCook, IL 60525
Plumbing Joint Apprenticeship Training Committee	5733 Elizabeth Ave. St. Louis, MO 63110
Prairie Steel Co.	P.O. Box 284 Havana, IL 62644
Prestolite Batteries	Allied Signal Inc./ Prestolite Batteries P.O. Box 2545R Morristown, NJ 07960-2245
Price Watson Company	1909 No. Clifton Ave. Chicago, IL 60614
Ramak Industries Division of Equipment Engineering Company	P.O. Box 18363 Memphis, TN 38118
Ranken Technical Institute	4431 Finney Ave. St. Louis, MO
Ray-Bar Engineering Corp.	Azusa, CA
Red Diamond Manufacturing Company	RR 2, Box 828 Hot Springs, AR 71901

Redfield Iron & Metal	ZR 359 Redfield, SD 57469
Reeves Scrap Metal	6900 Brush Island Road No. Little Rock, AR 72117
Reinert-Preisler Electrotype Co.	914 Pine Street St. Louis, MO 63101
Reliance Battery Co.	2204 South 8th Street Council Bluffs, IA 51501
Remington Arms Company; U.S. Army Armament Command	Independence, MO 64050
Reve International	6122 W. 55th Ave. Arvada, CO
Rex Curtsinger, Sr.	2204 E. Main Street Decatur, IL 62521
Reynolds Electric <sup>6</sup>	Granite City, IL
Rifkin Scrap Iron & Metal Co.	1445 N. Niagara Saginaw, MI 48602
Romak Industries	P.O. Box 396 Olive Branch, MS
Rosen Metals	P.O. Box 121 Baldwin, WI 54002
Roth Brothers	P.O. Box 158 E. Syracuse, NY
Ruben Metal Co., Inc.	2415 So. Archer Ave. Chicago, IL
S & R Metal Co.	5845 So. May Street Chicago, IL 60621
Salvage Battery & Lead Co.	P.O. Box 179 Mishicot, WI 54228
Sam Allen & Son, Inc.	P.O. Box 2 Pontiac, MI 48056

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<sup>6</sup> Reynolds Electric supplied grade "B" lead - specification unknown.

Samencorp Inc.	445 Park Avenue New York, NY 10022
Samuel Hide & Metal	86 East Hunt Pargould, AR
Sanders Lead Co., Inc.	P.O. Drawer 707 Troy, AL 36081
Scheer Shooting Supplies, Inc.	330 West Eagle Arlington, NE 68002
Schwartz Metal Processors and Traders	P.O. Box 218 Marshalltown, IA
Seidenfeld & Son Iron & Metal	401 S.E. 7th Street Des Moines, IA 50309
S & G Metal Industries, Inc.	P.O. Box 2039 Kansas City, KS 66110
Shanfeld Bros.	70 Dock Street St. Louis, MO 63147
Shanke Metals, Inc.	1410 Pierce Ave. St. Louis, MO 63110
Shapiro Sales Co.	5040 North 2nd Street St. Louis, MO 63147
Sherwin Williams Co. Container Division	1717 Gifford Road Elgin, IL 60129
Shostak Iron & Metal	7th and Kindelberger Rd. Kansas City, KS 66115
Sioux City Compressed Steel	214 Court Street Sioux City, IA 51101
Sol Alman Co.	1300 East 9th Street POB 2244 Little Rock, AR 72203
Sol Tick & Co. Inc.	901 Eldorado Street Box 30 Decatur, IL 62525

South Side Machine Works, Inc.	3761 Eiler Street P.O. Box 22199 St. Louis, MO
Southern Iron & Supply Co.	6326 So. Broadway St. Louis, MO 63110
Southside Machine Shop	3761 Eiler Street St. Louis, MO 63116
Southwestern Bell Telephone Co.	15400 E. Truman Road Independence, MO 64050
Spartan Printing Company; Division of World Color Press, Inc.	2nd and Dickey Street Sparta, IL 62286
Springfield Battery Co.	3000 East Cook Springfield, IL 62707
St. Joe Lead <sup>7</sup>	250 Park Avenue New York, NY 10017
St. Louis Bottle Iron & Metal Co.	2039 Cole Street St. Louis, MO 63107
St. Louis Law Printing Co.	812 Arcade Building St. Louis, MO 63101
Standard Lead Co.	15396 Idaho Detroit, MI 48238
Standard Storage Battery Co.	2286 Capp Road St. Paul, MN
Stanford Linear Accelerator	P.O. Box 4349 Stanford, CA 94305
Stanley Toebben	Route 5 Jefferson City, MO 65101
Steel Baling Co. Inc.	1901 Converse, P.O. Box 408 E. St. Louis, IL 62202
Straightway Iron & Metal Co.	1936 Cole Street St. Louis, MO 63106

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<sup>7</sup> St. Joe supplied "corroding" and "pig" lead (pure) but also "Doe Run" and "chemical" brands - specification unknown.

Superior Typesetting Company	1709 Washington Ave. St. Louis, MO 63101
Suppo Smelting & Refining Co., Inc.	1240 West Carroll Ave. Chicago, IL 60607
Shur-Start Battery Company	6767 St. Charles Rock Road St. Louis, MO 63133
Swan Rubber Co.	Rt. #2 Stillwater, OK
Texas Mining & Smelting	P.O. Box 559 Laredo, TX 78041
T.G. Marshall Manufacturing Co.	4326 Riverline Drive Earth City, MO 63045
Tri-City Scrap Company	P.O. Box 21199 Louisville, KY 40221
Turner Salvage Co.	Route 1, Box 101 Moorehead, MN 56560
Union Compressed Steel	5200 Main Street Duluth, MN 55807
Union Scrap Co.	210 15th Ave. North Minneapolis, MN 55411
United Scrap Lead	P.O. Box 25 Troy, OH 45373
Unique Art Glass	3649 Market Street St. Louis, MO 63110
University of Illinois at Urbana	223 Administration Bldg. Urbana, IL 61801
U.S. Scrap & Metal Company	P.O. Box 1484 550 Southside Drive Decatur, IL 62526
U.S. Supply Company	901 Farnam Street Omaha, NE 68102
U.S.S. Lead Refinery Inc.	5300 East Kennedy Ave. E. Chicago, IN 46312

Western Electric Co.

A T & T/ Western Electric Co.  
Room 3WA-148  
1 Oakway  
Berkeley Heights, NJ 07922

Western Gun & Supply

P.O. Box 1848  
Grand Island, NE 68801

Westerville Creamery Co.

400 Hazel Street  
Covington, OH 45318

Wicks Organ Company

1100 Fifth Street  
Highland, IL 62249

William S. Lasich & Sons

3315 West Point  
Collinsville, IL 62234

Wisconsin Lead Co.

5116 Lincoln Ave.  
Milwaukee, WI 53219

Young Radiator Co.

2825 Four Mile Road  
Racine, WI 53404

**NL**

FEDERAL EXPRESS MAIL

January 10, 1990

Director, Waste Management Division  
US EPA, Region V  
Attn: Mr. Brad Bradley (5HE-12)  
230 S. Dearborn Street  
Chicago, IL 60604

Director, Illinois Environmental  
Protection Agency  
Attn: Mr. Ken M. Miller  
2200 Churchill Road  
Springfield, IL 62706

RE: Taracorp Site  
Granite City, Illinois  
Bi-Monthly Progress Report

Dear Gentlemen:

This correspondence shall serve as our Fourteenth Bi-Monthly Progress Report pursuant to Section J, Paragraph 23(a), of the Agreement and Administrative Order by Consent, May 14, 1985 (herein after the "Agreement"). Additionally, this shall serve as NL's request for information pursuant to the provisions of the Freedom of Information Act ("FOIA") for the information specified below.

On October 30, 1989, a meeting was held in Chicago to discuss the Agencies comments on the "Draft Preliminary Feasibility Study Report" (DPFSR). This meeting was attended by Ms. Bev Kush and Mr. Brad Bradley of the UESPA, Region V, Mr. Ken Miller, Illinois EPA; Mr. Frank D. Hale, O'Brien & Gere Engineers, and Stephen Holt, NL. The meeting discussions centered on technical issues presented in the Agencies comments of October 3, 1989. While the Agencies did acknowledge that off site industrial/commercial properties would not be subjected to remediation, agreements were not reached regarding appropriate site specific guidelines for remediation of residential properties. NL received Mr. Bradley's confirmation of this meeting on November 9, 1989.

**NL Industries, Inc.**

Corporate Environmental Services  
PO. Box 1090, Hightstown, N.J. 08520 Tel. (609) 443-2405

NL responded to the Agencies comments on the DPFSR on November 10, 1989, pursuant to paragraph 16 of the Agreement.

Since issues relating to the establishment of site specific guidelines for defining remediation of offsite residential properties were not resolved during the October 30th meeting, an additional meeting was held on November 14, 1989, to resolve these issues. This meeting was attended by Mr. Roger Grimmes, EPA; Mr. Steven A. Tasher, Wilkie, Farr & Gallagher; Ms. Janet D. Smith, NL; as well as those individuals noted above. During this meeting, a review of the technical and legal aspect of the issues, failed to produce a satisfactory resolution.

On November 13, 1989, NL provided the USEPA with a list of generators/suppliers for the site, as well as a draft Section 104e letter. Additionally, NL provided the USEPA with a legal memorandum setting forth the basis for the designation of the listed entities as PRP's

Ms. Janet Smith and Mr. Steve Tasher met with Steve Siegel, USEPA, on December 8, 1989. Since Mr. Siegel has recently been assigned to this project, Ms. Smith and Mr. Tasher reviewed past project activities, the referenced draft Notice letter, the list of generators/suppliers, and provided him with a "Waste-in-list".

Several boxes of "responsive information", supporting the "Waste-in-list" were forwarded to Mr. Bradley at approximately the same time.

NL participated in the Agencies December 18, 1989 meeting of PRP's. Following the Agencies presentation, NL addressed questions from those present and offered to take part in the establishing of a Steering Committee. However, NL has not been approached regarding any such effort.

Pursuant to FOIA provisions, NL requests the following information:

1. The Agencies "Addendum to the DPRSR" and the Agencies "Proposed Plan".
2. Area maps depicting the area of potential remediation, as presented during the December 18, 1989 meeting in Chicago.
3. The Agencies basis of cost estimates and all work sheets detailing the cost estimates.
4. Copies of all documents released, distributed or in any way made available to the public since January 1, 1990. This shall include all press releases, documents placed in the site specified "Information Repository" (Granite City Public Library), documents and related information provided to the local governing bodies, letters or other



correspondence forwarded to the residents in the area, and any other information, documents, correspondence pertaining to the subject site.

5. The "Preliminary Health Evaluation" September, 1988, as developed by the ATSDR, or related issuing body.
6. The "Confidential Study" that the Illinois EPA and/or US EPA are relying upon for the proposed plan.

Please do not hesitate to contact me at (609) 443-2405 if you should have any questions regarding the above.

Very truly yours,



Stephen W. Holt  
Senior Environmental Engineer

SWH:pmm  
Enclosure

cc: F.D. Hale, OBG  
B.F. Kaufman, Willkie, Farr & Gallagher

Deputy Chief, Environmental  
Control Division  
Illinois Attorney General's Office  
500 South Second Street  
Springfield, Illinois 62706

c:/wp50/ces/bimonthly.swh

**NL**

CERTIFIED MAIL - RRR

March 12, 1990

Director, Waste Management Division  
USEPA, Region V  
Attn: Mr. Brad Bradley (5HE-12)  
230 S. Dearborn Street  
Chicago, IL 60604

Director, Illinois Environmental  
Protection Agency  
Attn: Mr. Ken M. Miller  
2200 Churchill Road  
Springfield, IL 62706

RE: Taracorp Site  
Granite City, Illinois  
Bi-Monthly Progress Report

Dear Gentlemen:

This correspondence shall serve as our fifteenth Bi-Monthly Progress Report pursuant to Section J. Paragraph 23(a), of the Agreement and Administrative Order by Consent, May 14, 1985 ("Agreement").

NL Industries submitted an Information Request under the provisions of the Freedom of Information Act ("FOIA") on January 10, 1990, requesting various documents that the Agency is relying upon in support of their proposed Remedial Alternative. To date, the Agency has not responded to this request.

On January 16, 1990, Steven A. Tasher, Counsel for NL Industries, provided notice to Mr. Adamkus, Regional Administrator, USEPA, Region V, that the EPA unlawfully breached the "Agreement and Administrative Order by Consent" (February 28, 1986) between EPA, Illinois EPA and NL, by circumventing the provisions of Paragraph 17 of the Order.

**NL Industries, Inc.**

Corporate Environmental Services  
P.O. Box 1090, Hightstown, N.J. 08520 Tel. (609) 443-2405

Following receipt of the EPA's map of the proposed area of remediation, and the EPA's basic estimated costs, a review of the information was conducted that identified substantial errors in the basic cost estimates. Information regarding these errors was provided to Mr. Bradley on January 17, 1990. This permitted the EPA to adjust their cost estimate prior to the public meetings of January 23-25th.

NL provided a timely response to the EPA's information request on January 19, 1990, confirming NL's provision of responsive documents.

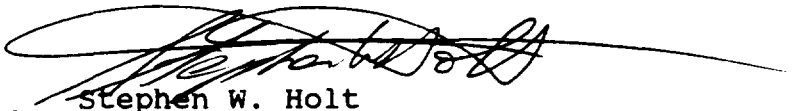
Representatives of NL Industries and O'Brien & Gere Engineers attended the public meetings that were held January 23-25, 1990, and the public hearing held February 8, 1990.

On February 21, 1990, NL received notification that the Public Comment period was extended until March 12, 1990, and that an availability session was being held by the EPA on March 5, 1990, to provide the public the opportunity to meet with Ms. Pat VanLeeuwen, Toxicologist, USEPA, Region V. Swiatoslov W. Kaczmar, Ph.D, Environmental Toxicologist, and Frank D. Hale, representatives of O'Brien & Gere Engineers, attended this public availability session.

NL will be submitting comments on the USEPA's proposed remedial alternative under separate cover.

Please do not hesitate to contact me at (609) 554-2405 if you should have any question regarding the above.

Very truly yours,



Stephen W. Holt  
Senior Environmental Engineer

SWH:pmm

cc: F.D. Hale, OBG  
B.F. Kaufman, Willkie, Farr & Gallagher

Deputy Chief, Environmental  
Control Division  
Illinois Attorney General's Office  
500 South Second Street  
Springfield, Illinois 62706